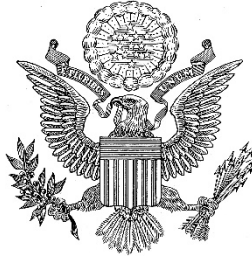


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July 1, 2024

Hon. Gary L. Favro
United States Magistrate Judge
14 Durkee Street, Suite 350
Plattsburgh, New York 12901

Re: *USA v Magnat Ram*
8:24-MJ293 (GLF)

Dear Judge Favro:

I write to supplement the Pretrial Services Report dated June 28, 2024, in support of Mr. Ram's request to be released on conditions in the referenced matter. Probation did not conduct an interview with Mr. Ram, and as such his residence, family ties, employment history, financial resources and health status are not detailed in the report. I conferenced with Mr. Ram through an interpreter on June 26, 2024. At that time Mr. Ram provided a detailed account of his life. I anticipate the Government will seek Mr. Ram's detention based on an allegation that he is a flight risk. Mr. Ram is the opposite of a flight risk for a number of reasons. His release on conditions would be appropriate here.

Mr. Ram resides at 44 Cedar Street, Hicksville New York, 11801. His wife Sunita Davy, fifteen-year-old son and three-year-old daughter reside there with him. Mr. Ram has resided in the United States since approximately 2019 and has an immigration claim pending in which he is seeking asylum status.

First and critically, his three-year-old daughter is a United States citizen. He is not going to flee to avoid these charges, which carry in the grand scheme of federal crimes a relatively modest potential penalty, at the expense of future contact with his young citizen daughter.

Second, Mr. Ram has work authorization based on his pending asylum application. Attached here as Exhibit A is his employment authorization card demonstrating Mr. Ram's legal

ability to work in the United States. Mr. Ram has worked recently as an Uber driver and will continue to do so to support his wife and two children if released.

Third – Mr. Ram diagnosed as diabetic. While this chronic condition is manageable with routine medical intervention, in the absence of medication and testing it can become life threatening. Mr. Ram will not flee this prosecution while suffering from a potentially life-threatening chronic condition that is easily treated with proper attention and could become rapidly life-threatening without access to proper care.

Mr. Ram simply has no reason to flee. He lives New York State and has for many years. He has significant ties to the community he lives in – his wife and children live with him. He can return to work if released and has no history indicating he would be a flight risk. In fact, he has a pending asylum application – the last thing he wants do is return to India. He will certainly appear for all court appearances as required if released on conditions.

The Court can set conditions that make his reappearance likely – the Court can require Mr. Ram turn in his travel documents such as a passport. The Court can require Mr. Ram to report to pretrial services in the Eastern District of New York. The Court can require him to wear a GPS location monitor. Any of these conditions would be more than sufficient to allow for Mr. Ram's release pending trial.

Based on all the above I would request the Court release Mr. Ram on conditions as proposed herein.

Thank you for your attention to this matter. Please contact my office with any questions.

Very Truly Yours,



Eric K. Schiffinger

Enc

cc: AUSA Alex Wentworth-Ping, Esq., via ECF
Client